Case 1:24-cv-07729-VSB Document 16 Filed 04/07/25 Page 1 of 2 Joseph & Norinsberg LLC

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VIA ECF

The Honorable Vernon S. Broderick United States District Judge Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 APPLICATION GRANTED SO ORDERED A VERNON S. BRODERICK U.S.D.J. 04/07/2025

Re: Robles v. The Other Side Dispensary LLC 1:24-cv-7729 (VSB) (SLC)

Dear Judge Broderick,

We represent the Plaintiff, Primitivo Robles ("Plaintiff") in the above-referenced matter brought under the Americans with Disabilities Act ("ADA"). Together with counsel for the Defendant we submit this letter requesting an extension of both Defendant's time to Answer the Complaint and Plaintiff's time to move for default judgment should Defendant fail to Answer.

Our office has spoken to both David Stein and David Nieporent, counsel for Defendant herein, who have advised that they intend to respond to the Complaint. However, they have not yet filed their Answer. As a courtesy, we have consented to an extension of their time to file an Answer until Monday, April 7, 2025. We have also advised Defense counsel that we would be requesting an extension of our time to file a motion for default judgment should Defendant fail to file its Answer by Monday, April 7, 2025.

Based on the foregoing, we would respectfully request an <u>extension of Defendant's time</u> to answer until April 7, 2025, and an <u>extension of Plaintiff's time to file a default judgment until April 11, 2025</u>.

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We thank the Court for its attention to this matter and for its consideration of these

Respectfully submitted,

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c.c.

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